

SKLARWILLIAMS, PLLC
Crane M. Pomerantz (NV Bar NO. 14103)
410 S. Rampart Blvd., Suite 350
Las Vegas, Nevada 89145
Telephone: (702) 360-6000
Facsimile: (702) 360-0000
CPomerantz@sklar-law.com

OLSHAN FROME WOLOSKY LLP
Kyle C. Bisceglie (*pro hac vice*)
Kyle J. Kolb (*pro hac vice*)
1325 Avenue of the Americas
New York, New York 10019
Telephone: (212) 451-2300
Facsimile: (212) 451-2222
Kbisceglie@olshanlaw.com
Kkolb@olshanlaw.com

*Attorneys for Plaintiffs REMARK
HOLDINGS, INC. and KANKAN LIMITED*

BOIES SCHILLER FLEXNER LLP
Richard J. Pocker (NV Bar No. 3568)
300 South Fourth Street, Suite 800
Las Vegas, Nevada 89101
Telephone: (702) 382-7300
Facsimile: (702) 382-2755
rpocker@bsflfp.com

BOIES SCHILLER FLEXNER LLP
Alan B. Vickery (*pro hac vice*)
John F. LaSalle (*pro hac vice*)
55 Hudson Yards
New York, New York 10001
Telephone: (212) 446-2300
Facsimile: (212) 446-2350
avickery@bsflfp.com
jlalalle@bsflfp.com

Attorneys for Defendant ADAM ROSEMAN

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

REMARK HOLDINGS, INC., a Delaware corporation;
and KANKAN LIMITED., a British Virgin Islands
company,

Plaintiffs,

v.

CHINA BRANDING GROUP LIMITED (IN OFFICIAL
LIQUIDATION), an exempted Cayman Islands company
acting by and through its joint official liquidators;
ADAM ROSEMAN; JOINT OFFICIAL
LIQUIDATORS, with no personal liability, HUGH
DICKSON OF GRANT THORNTON SPECIALIST
SERVICES (CAYMAN) LTD, a Cayman Islands
company, and DAVID BENNETT OF GRANT
THORNTON RECOVERY AND REORGANISATION
LTD, a Cayman Islands company; and DOES 1 through
10, inclusive,

Defendants.

Case No. 2:18-cv-00322-JAD-CWH

**STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF
TIME TO FILE AMENDED
COMPLAINT
(FOURTH REQUEST)**

1 Plaintiffs Remark Holdings, Inc. and Kankan Limited, and Defendant Adam Roseman hereby
2 stipulate and agree that the deadline to file an Amended Complaint should be extended from **May 3,**
3 **2019, until May 24, 2019.** In support of this stipulation, the parties to this stipulation state as follows:

4 1. On March 26, 2019, the Court issued a Decision and Order granting in part and
5 denying in part Roseman's motion to dismiss the Complaint, and granting Plaintiffs leave to file an
6 Amended Complaint on or before April 9, 2019 (ECF No. 66). All parties in this action previously
7 requested, and were granted, an extension of time to file an Amended Complaint until April 19, 2019.
8 The Court granted a second extension until April 26, 2019, and the Court granted a third extension
9 until May 3, 2019.

10 2. Plaintiff and Defendant Roseman have reached a settlement in principle and Plaintiffs
11 seek additional time to finalize and execute a written settlement agreement, and make this extension
12 request in an effort to preserve judicial and party resources.

13 3. Defendant Roseman consents to this request.

14 4. Defendant China Branding Group Limited (in Official Liquidation) acting through its
15 Joint Official Liquidators, Hugh Dickson of Grant Thornton Specialist Services, and David Bennett
16 of Grand Thornton Recovery and Reorganization Ltd. (the "Cayman Defendants") do not take a
17 position on this application, but respectfully reiterate the request made in their prior filing (ECF No.
18 67 at 1, lines 26-27) that the Court rule upon their pending motion to dismiss. (ECF No. 40).

19 5. Plaintiffs object to the request of the Cayman Defendants on the basis that it is
20 procedurally irrelevant to the request for an extension and mooted by the Stipulation for Settlement
21 and Motion to Enforce. (*See* ECF No. 63).

22 6. This is the fourth request to extend the time for Plaintiffs to file an Amended
23 Complaint.

24 DATED: May 3, 2019

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/s/ Kyle J. Kolb

Kyle C. Bisceglie (*pro hac vice*)
Kyle J. Kolb (*pro hac vice*)
OLSHAN FROME WOLOSKY LLP
1325 Avenue of the Americas
New York, New York 10019

Crane M. Pomerantz (NV Bar No. 14103)
SKLAR WILLIAMS, PLLC
410 S. Rampart Blvd., Suite 350
Las Vegas, Nevada 89145

*Attorneys for Plaintiffs REMARK
HOLDINGS, INC. and KANKAN LIMITED*

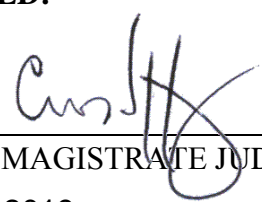
/s/ John F. LaSalle

Alan B. Vickery (*pro hac vice*)
John F. LaSalle (*pro hac vice*)
BOIES SCHILLER FLEXNER LLP
55 Hudson Yards
New York, New York 10001

Richard J. Pocker (NV Bar No. 3568)
BOIES SCHILLER FLEXNER LLP
300 South Fourth Street, Suite 800
Las Vegas, Nevada 89101

Attorneys for Defendant ADAM ROSEMAN

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: May 8, 2019